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EDMUND G. BROWN JR.
GOVERNOR

November 10, 2015

Ms. Sheryl L. Spiller, Director
Los Angeles County Department of Public Social Services
12860 Crossroads Parkway South
City of Industry, CA 91746

Dear Ms. Spiller:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of July/August 2015. Enclosed is the final report

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>.

If you need technical assistance in the development of your CAP, please feel free to contact Daniel Cervantes at (916) 916-654-0976. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

Original signed by Bureau Chief

JIM TASHIMA, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Charles Palmer, Civil Rights Coordinator

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CalFresh Policy Bureau

Carlos Ocampo, Chief
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
LOS ANGELES DEPARTMENT OF
PUBLIC SOCIAL SERVICES**

**Conducted on
July/August 2015**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
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Reviewer:

Daniel Cervantes

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Los Angeles Department of Public Social Services' regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on July 27 – 30, 2015. The second week of the review took place August 17 – 20, 2015. An exit interview was held on August 20, 2015, to review the preliminary findings.

The review was conducted in the following locations:

| Name of Facility | Address | Programs | Non-English languages spoken by a substantial number of clients (5% or more) |
|---------------------------|---|----------------------|---|
| Glendale # 02 | 4680 San Fernando Rd. Glendale, CA 91204 | CalWORKs CalFresh | Spanish, Armenian |
| Pasadena # 03 | 955 N. Lake Ave., Pasadena, CA 91104 | CalWORKs CalFresh | Spanish |
| Belvedere # 05 | 5445 Whittier Blvd., Los Angeles, CA 90022 | CalWORKs CalFresh | Spanish |
| Metro Family # 13 | 2615 S. Grand Ave., Los Angeles, CA 90007 | CalWORKs CalFresh | Spanish |
| Metro East #15 | 2855 E. Olympic Blvd., Los Angeles, CA 90023 | CalWORKs CalFresh | Spanish |
| Metro Special #70 | 2707 S. Grand Ave., Los Angeles, CA 90007 | CalFresh | Spanish |
| Region I – West County | 5200 W. Century Blvd., Los Angeles, CA 90045 | GAIN | Spanish |
| Pomona #19 | 360 E. Mission Blvd. Pomona, CA 91766 | IHSS | Spanish, Mandarin, Cantonese |
| Burbank #73 | 3307 N. Glenoaks Blvd. Burbank, CA 91504 | IHSS | |

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2014/15 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate groups. In this review the following organization(s) were contacted for feedback. The following organizations responded to our request:

Luong Chau, Jenecia Martinez, Claudia Menjivar; Legal Aid Foundation, Los Angeles (LAFLA)

1102 Crenshaw Blvd.
Los Angeles, CA 90019
Tel: (323) 801-7991

Connie Lo, Asian Americans Advancing Justice – LA (AAAJ-LA)

1145 Wilshire Blvd., 2nd Floor
Los Angeles, CA 90017
Tel: (213) 977-7500

Helen Tran, Neighborhood Legal Services of Los Angeles County (NLSLA)

1102 East Chevy Chase Drive,
Glendale, CA 91205
Tel: 800-433-6251

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

| Classifications | Total | Bilingual |
|------------------------|--------------|------------------|
| Eligibility Workers | 24 | 19 |
| Adult Program Workers | 6 | 4 |
| Receptionist/Screeners | 9 | 7 |
| Total | 39 | 30 |

An additional 3 staff interviews were scheduled but were not conducted due to staff unavailability.

Program Manager Surveys

| | |
|-------------------------------|----|
| Number of surveys distributed | 10 |
| Number of surveys received | 10 |

Reviewed Case Files

| | |
|--|--|
| English speakers' case files reviewed | 3 |
| Non-English or limited-English speakers' case files reviewed | 75 preselected 8 selected onsite |
| Languages of clients' cases | English, Spanish, Korean, Armenian, Arabic, Farsi, Cambodian, Hindi, Russian, Tagalog, Gujarati, ASL, Cantonese/Mandarin |

Sections III through IX of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section X evaluates the county's Call/Service Centers services provided to non-English speaking clients and clients with a disability.

Section XI reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section XII highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XIII of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

| Access to Services, Information and Outreach | Yes | No | Some-times | Comments |
|--|------------|-----------|-------------------|--|
| Does the county accommodate clients by flexing/extending their hours or allowing applications to be mailed in? | X | | | Participants have the option to apply for benefits online using the Your Benefits Now website. They may also mail in their applications to their local office. IHSS offices make home visits to participants and accommodate them from 8:00am to 6:00pm. |
| Can applicants access services when unable to go to the office? | X | | | Services can be accessed by mail, online using Your Benefits Now (YBN), Interactive Voice Response (IVR), the LADPSS Website, and the customer service toll free line. |
| Does the county ensure the awareness of available services for individuals in remote areas? | X | | | Program and service information is available through posters, pamphlets, community outreach, radio announcements, YBN online, and the |

| | | | | |
|--|--|--|--|-----------------|
| | | | | LADPSS website. |
|--|--|--|--|-----------------|

| Signage, posters, pamphlets | Yes | No | Some-times | Comments |
|--|------------|-----------|-------------------|---|
| Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)? | X | | | All public contact offices visited had all available languages prominently displayed in the lobby. |
| Is the pamphlet distributed and explained to each client at intake and re-certification? | | X | | While reviewing case files, LADPSS employees document in the appropriate program the distribution/ explanation of the pamphlet. While observing behind reception counters and other in person contact between LADPSS staff and participants, the form was provided to the client, but never explained. |
| Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, and Vietnamese? | X | | | Yes. The most current version of the PUB 13 pamphlet was prominently displayed in lobby of the offices visited. |
| If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages? | | | | N/A. All offices visited had all available PUB 13 displayed in the lobby. |
| Was the Pub 13 available in large print (English and Spanish), CD, audiocassette and Braille? | X | | | I did not request to see any large print/ CD, audiocassette, nor Braille in the offices I visited unannounced. |

| Signage, posters, pamphlets | Yes | No | Sometimes | Comments |
|---|------------|-----------|------------------|--|
| Were the current versions of the required posters present in the lobbies? | X | | | All offices visited had the most current version of the posters prominently displayed in the lobby. |
| Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages? | | X | | All offices visited had instructional and directional signs posted in the required languages. Offices which were visited unannounced did not have translated directional and informational in required languages. |

B. Corrective Actions

| Informational Element | Corrective Action Required |
|---------------------------------------|--|
| Distribution of CDSS' Pub 13 | Los Angeles DPSS shall ensure that the Pub 13 pamphlet, "Your Rights Under California Welfare Programs" is both given and explained to program participants in all of the programs for which CDSS has oversight responsibility. Div. 21-107.221 |
| Instructional and directional signage | Los Angeles DPSS shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. Div. 21-107.212 and .24 |

C. Recommendation

The IHSS Pomona office located 360 E. Mission Blvd currently has three languages that exceed the 5% threshold requiring additional services at this office. Adding a fourth language, Tagalog, should be considered when translating any information/directional signage as Tagalog is nearing the 5% threshold.

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

| | | |
|--------------|--|-------|
| Pub 13 | "Your Rights under California Welfare Programs" | 06/11 |
| Pub 86 | "Everyone is Different, but Equal Under the Law" | 03/07 |
| Form AD 475B | "And Justice for All" | 12/99 |

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website

<http://www.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

- 1. Facility Location:** Glendale # 02
4680 San Fernando Rd., Glendale, CA 91204

No physical findings at this location.

- 2. Facility Location:** Pasadena # 03
955 N. Lake Ave., Pasadena, CA 91104

| Facility Element | Findings | Corrective Action |
|------------------|---|---|
| Men's restroom | No accessible signage on restroom's entrance. | Men's toilet and bathing facilities shall be identified by an equilateral triangle, 1/4" thick with edges 12" long and a vertex pointing upward. (CA T24 11B-703.7.2.6.1) pg 310 |
| | No accessible signage on wall for permanent identification. | Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) pg 311 |
| | Door pressure excessive at 14 lbs. | The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg 224 |
| | Urinal too high at 22 inches. | Urinals shall be the stall-type or the wall-hung type with the rim 17" max. above the finish floor or ground. (CA T24 11B-605.2) (ADA 605.2) pg 337 Urinals shall be 13½" deep min. measured from the outer face of the urinal rim to the back of the fixture. (CA T24 11B-605.2) (ADA 605.2) pg 337 |
| | Pipes underneath sink not insulated. | Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise |

| | | |
|------------------|---|---|
| Woman's restroom | | configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg 330 |
| | No accessible signage on restroom's entrance. | Women's toilet and bathing facilities shall be identified by an equilateral triangle, 1/4" thick with edges 12" long and a vertex pointing upward. (CA T24 11B-703.7.2.6.1) pg 310 |
| | No accessible signage on wall for permanent identification. | Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) pg 311 |
| | Door pressure excessive at 13 lbs. | The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg 224 |
| | Pipes underneath sink not insulated. | Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg 330 |
| | Base of mirror above sink too high at 48 inches. | Mirrors located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 40" max. above the finish floor or ground. Fig. 8 (CA T24 11B-603.3) (ADA 603.3) pg 319 |

3. Facility Location: Belvedere # 05
5445 Whittier Blvd., Los Angeles, CA 90022

| Facility Element | Findings | Corrective Action |
|-------------------|---|--|
| Client lobby | No accessible counter in GAIN lobby #2. | The tops of dining surfaces and work surfaces shall be 28" min. and 34" max. above the finish floor or ground. (CA T24 11B-902.3) (ADA 902.3) pg 55 |
| Restroom (Unisex) | Pipes underneath sink not insulated. | Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. (CA T24 11B-606.5) (ADA 606.5) pg 330 |

4. Facility Location: Metro Family # 13
2615 S. Grand Ave., Los Angeles, CA 90007

No physical findings at this location.

5. Facility Location: Metro East #15
2855 E. Olympic Blvd., Los Angeles, CA 90023

No physical findings at this location.

6. Facility Location: Metro Special #70
2707 S. Grand Ave., Los Angeles, CA 90007

| Facility Element | Findings | Corrective Action |
|-------------------------------------|------------------------------------|---|
| Men's restroom: Lobby 1 | Door pressure excessive at 12 lbs. | The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg 224 |
| Lobby 4 | Door pressure excessive at 16 lbs. | |
| Woman's restroom: Lobby 1 | Door pressure excessive at 11 lbs. | The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg 224 |
| Lobby 4 | Door pressure excessive at 11 lbs. | |

7. Facility Location: Region I – West County
5200 W. Century Blvd., Los Angeles, CA 90045

| Facility Element | Findings | Corrective Action |
|---|--|--|
| Restroom Unisex restroom upstairs | Restroom does not have grab bars around toilet's perimeter | Grab bars with circular cross sections shall have an out-side diameter of 1¼" min. and 2" max. (CA T24 11B-609.2.1) (ADA 609.2.1) pg 321 Grab bars with non-circular cross sections shall have a cross-section dimension of 2" max. and a perimeter dimension of 4" min. and 4.8" max. (CA T24 11B-609.2.2) (ADA 609.2.2) pg 321 Grab bars shall be installed in a horizontal position, 33" min. and 36" max. above the finish floor measured to the top of the gripping surface. (CA T24 11B-609.4) (ADA 609.4) pg 321 |
| | Toilet protector dispenser too high at 55 inches. | All operable parts, including coin slots, shall be 40" max. above the finish floor. (CA T24 11B-603.5) pg 319 |

8. Facility Location: Pomona #19
360 E. Mission Blvd. Pomona, CA 91766

No physical findings at this location.

9. Facility Location: BURBANK #73
3307 N. Glenoaks Blvd. Burbank, CA 91504

No physical findings at this location.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

| Question | Yes | No | Some-times | Comments |
|--|------------|-----------|-------------------|---|
| Does the county identify a client's language need upon first contact? How? | | X | | Offices part of the preplanned visit all did a satisfactory job of identifying the participant's primary language. Offices which were visited unannounced did not identify the client's language needs upon first contact. |
| Does the county use a primary language form? | | X | | LADPSS uses the PA 481 Language Designation Form. The form is currently available in Armenian, Cambodian, Chinese, |

| Question | Yes | No | Some-times | Comments |
|--|----------|----|------------|--|
| | | | | English, Farsi, Korean, Russian, Spanish, Tagalog, and Vietnamese. In almost all of the non-English speaking cases reviewed, the county used an English PA 481. |
| Does the client self-declare on this form? | | | X | Client must select his/her oral and written preference. The form must then be signed and dated by both the worker and the client. In many cases reviewed, the PA 481 was incorrectly filled out, incomplete, and/or not signed by the participant. |
| Are non-English- or limited- English-speaking clients provided bilingual services? | | | X | Offices part of the preplanned visit did a satisfactory job of providing bilingual services. Offices which were visited unannounced did not provide services to the participant on various occasions. |
| After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter? | X | | | LADPSS' protocol is to assign a limited-English or non-English speaking case to a corresponding bilingual worker. If a worker bilingual worker is unavailable in the client's preferred language, workers can request another certified county workers within the district/regional office. If an interpreter is unavailable from the district/regional office, the worker then attempts to secure an interpreter within the department using the Bilingual Resources Unit Database. |

| Question | Yes | No | Some-times | Comments |
|---|----------|----|------------|---|
| | | | | <p>If an interpreter is still unavailable, the worker then notifies the district/regional Civil Rights Liaison to initiate a conference between the worker, participant, and an AVAZA certified interpreter via the language line.</p> <p>Please see recommendations below.</p> |
| Does the county have a language line provider, a county interpreter list, or any other interpreter process? | X | | | <p>The use of the AVAZA language line is the last step use by LADPSS is trying to secure an interpreter.</p> <p>Although the language line is available, it's not used as often as it should be.</p> |
| Is there a delay in providing services? | X | | | <p>During the phone interviews, some workers stated that participants were made to reschedule their appointment up to a week later to secure interpretive services. Others workers interviewed mentioned participants were made to wait 2-3 days, making participants return to the office to attain services in their preferred language.</p> <p>In speaking with county worker in person, some stated that participants are often made to wait up to several hours for interpretive services.</p> |
| Are county interpreters determined to be competent? | | | X | <p>All bilingual workers must be certified by the county by completing oral and written test.</p> <p>On 2 separate occasions during the review, LADPSS employees admitted to using non-certified</p> |

| Question | Yes | No | Some-times | Comments |
|---|----------|----------|------------|--|
| | | | | interpreters. Further, I witnessed 2 separate interactions between LADPSS staff and participants who spoke the participant's primary language, but were not certified. |
| Does the county have adequate interpreter services? | | | X | See comments above |
| Does the county allow minors to be interpreters? If so, under what circumstances? | | X | | |
| Does the county allow the client to provide his or her own interpreter? | X | | | If a client wishes to use their own interpreter, LADPSS form PA 481A must be filled out and signed. |
| Does the county ensure that the client-provided interpreter understands what is being interpreted for the client? | X | | | If the worker feels as if the interpretive service provided by the client provided interpreter is inadequate, he/she may bring in a county certified interpreter to ensure adequate translation. |
| Does the county use the CDSS-translated forms in the clients' primary languages? | | | X | Forms were generally sent out in the client's primary language. As in previous reviews, the SAWS 1 and SAWS 2 were found in English in nearly all of the case files reviewed. |
| Is the information that is to be inserted into NOA translated into the client's primary language? | X | | | LADPSS uses a filler letter that instructs the client to contact their worker if there is something that he/she does not understand. |
| If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language? | X | | | See comments above. |

| Question | Yes | No | Some-times | Comments |
|--|----------|----|------------|--|
| Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)? | X | | | Auxiliary aids and services are available at each office upon the client's request. |
| Does the county identify a client with a disability (physical, mental, or learning)? | X | | | The GAIN program offers screening for learning disabilities based on test results. Accommodations are made on an as needed basis. |
| Does the county provide reasonable accommodations to clients with a disability (physical, mental, or learning)? | X | | | Managers and staff interviewed stated that they ensure the client's needs are always met regardless of the accommodation needed. |
| Does the county identify and assist the client who has learning disabilities or a client who cannot read or write? | X | | | See comments above. |
| Does the county offer screening for learning disabilities? | X | | | The GAIN program offers screening for learning disabilities based on test results. Accommodations are made on an as needed basis. |
| Is there an established process for offering screening? | X | | | LADPSS uses the State-mandated process employing the WTW 18, Learning Needs Screening tool, which is also incorporated into the automated CalWORKS Online Appraisal Tool as part of all CalWORKS WTW appraisals. The WTW 19, a hard copy of the Learning |

| Question | Yes | No | Some-times | Comments |
|---|----------|----|------------|---|
| | | | | Needs Screening reviewed with and provided to the participant. The participant may also waive learning disability screening or evaluation by signing the WTW 17, Waiver of CalWORKs Learning Disability Screening and/or Evaluation form. |
| Is the client identified as having a learning disability referred for evaluation? | X | | | GAIN participants screened as having a potential learning disability are referred for evaluation by professional assessors contracted with the Los Angeles County Office of Education. |

B. Corrective Actions

| Area of Findings | Corrective Actions |
|--|---|
| Bilingual Staff | Los Angeles DPSS shall ensure that a sufficient number of qualified bilingual employees shall be assigned to positions and locations serving a substantial number of non-English-speaking persons. Div. 21-115.1 |
| Effective Services | Los Angeles DPSS must develop and implement a policy that identifies the process to ensure effective services to applicants and recipients who are non-English speaking or who have disabilities. Div. 21-115 |
| Timely Services* (see comments below) | Los Angeles DPSS County must ensure that bilingual/interpretive services are prompt and without undue delay. Div. 21-115 |
| Interpreter Services | Los Angeles DPSS County must offer and provide free interpreter services using qualified interpreters. Div. 21-104q(1) and 21-115 |
| Written Materials | Los Angeles DPSS County must use and provide translated forms, to include translated notice of action forms, in the clients' primary languages when translated by CDSS. Div. 21-115.2 |

***Timely Services**

During the visit to Los Angeles, the focus was whether or not the county provided adequate interpretive services in a timely manner. The county has a four step process as outlined in the most recent Civil Rights Compliance Plan.

As previously mentioned, the county first tries to assign the participant to a bilingual worker in the participant's preferred language. If that cannot happen, the county attempts to provide interpretive services by looking within the District/Regional Office. If services still cannot be achieved, the worker, with the help of the local Civil Rights Liaison, searches department wide for an interpreter. The last option is the AVAZA language line.

The use of such rigid means of providing interpretive services causes an undue delay. At the exit interview, I discussed possibilities LADPSS should explore to achieve more expedient interpretive services. One of the solutions was the use of the AVAZA language line if an interpreter is not available within minutes.

Division 21 requires that LADPSS ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English speaking population and individuals with disabilities. The provision of bilingual/interpretive services shall be prompt without undue delays. Please see Division 21-115 for more information about providing bilingual/interpretive services.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

| Documented Item | Adult Programs (IHSS & APS) | CalWORKs & Employment Services (GAIN) | Non-Assistance CalFresh | Fraud |
|--------------------------------|--|--|--------------------------------|--------------|
| Ethnic origin documentation | SOC 295 Case narrative | GEARS PA 481 | LEADER PA 481 | PA 481 |
| Primary language documentation | SOC 295 Case narrative | GEARS PA 481 | LEADER PA 481 | PA 481 |

| Documented Item | Adult Programs (IHSS & APS) | CalWORKs & Employment Services (GAIN) | Non-Assistance CalFresh | Fraud |
|--|--|--|--|--|
| Method of providing bilingual services and documentation | PA 481 Case narrative | GEARS PA 481 | LEADER PA 481 | PA 481 Case narrative |
| Client provided own interpreter | PA 481A Case narrative | PA 481A Case narrative | PA 481A Case narrative | PA 481A Case narrative |
| Method to inform client of potential problem using own interpreter | PA 481A Case narrative | PA 481A Case narrative | PA 481A Case narrative | PA 481A Case narrative |
| Release of information to Interpreter | PA 481A Case narrative | PA 481A Case narrative | PA 481A Case narrative | PA 481A Case narrative |
| Individual's acceptance or refusal of written material offered in primary language | PA 481 Case narrative | PA 481 Case narrative | PA 481 Case narrative | PA 481 Case narrative |
| Documentation of minor used as interpreter | LADPSS does not use minors as interpreters | LADPSS does not use minors as interpreters | LADPSS does not use minors as interpreters | LADPSS does not use minors as interpreters |
| Documentation of circumstances for using minor interpreter temporarily | N/A | N/A | N/A | N/A |
| Method of identifying client's disability | CMIPS Case narrative | GEARS Case narrative | LEADER Case narrative | Respective program, Case narrative |

| Documented Item | Adult Programs (IHSS & APS) | CalWORKs & Employment Services (GAIN) | Non-Assistance CalFresh | Fraud |
|--|--|--|--------------------------------|---------------------------------------|
| Method of providing reasonable accommodation to the client with disability | CMIPS Case narrative | GEARS Case narrative | LEADER Case narrative | Respective program, Case narrative |

A. Corrective Actions

| Areas of Action | Corrective Action |
|--|--|
| Documentation if client provided own interpreter *See also call center findings, Section X. | When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23 |
| Documentation of interpreter signed confidentiality statement | Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24 |
| Documentation of primary language | Each agency shall ensure that case record identification shows the applicant's/recipients' ethnic origin and primary language. Div. 21-201.21 |
| Documentation that bilingual services were provided | Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22 |

| Areas of Action | Corrective Action |
|-----------------|---|
| General | Los Angeles DPSS must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116 ALL COUNTY LETTER NO. 08-65 ALL COUNTY LETTER NO. 06-20 |

C. Recommendation

The findings above are similar to previous reviews. LADPSS has effective forms that allow for thorough documentation. The forms, if filled out correctly and thoroughly, fulfill the state's requirements for documentation. Form PA 481, PA 481A were found in every case reviewed, but in many instances the form was not completely filled out or the form contradicted what was in the LEADER (or other relevant) program.

To ensure quality and thoroughness of documentation, perhaps a program specific template, a checklist, and/or some sort of QA should be implemented to ensure all forms are filled out correctly and all case documentation is thorough and accurate. Please see Division 21-116 and all relevant ACL/ACIN for more information and direction.

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

| Interview questions | Yes | No | Some-times | Comments |
|---|-----|----|------------|---|
| Do employees receive continued Division 21 Training? | X | | | LADPSS trains newly hired staff upon hire and training is required biannually. |
| Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint? | | X | | Staff preselected for phone interviews were all aware of the proper procedure to file a discrimination complaint. |

| | | | | |
|---|----------|--|--|---|
| | | | | Staff who were interviewed randomly in the offices visited did not know where to direct civil rights complaints. |
| Does the county provide employees Cultural Awareness Training? | X | | | Cultural awareness training is provided with Division 21 training. |
| Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)? | X | | | MEPA training is provided with Division 21 and cultural awareness training, but is more closely related to LADFS. |
| Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area? | X | | | |
| Does the county provide training on how to interact with clients with disabilities (physical, mental & learning)? | X | | | County staff is trained on how to assist participants who have obvious physical/mental disabilities. |

B. Corrective Actions

| Training Area | Corrective Action |
|------------------------------------|---|
| Division 21, Civil Rights Training | Los Angeles DPSS shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1 |

C. Recommendation

Preselected staff who were interviewed over the phone were well aware of the complaint process. During the in-person interviews, there were three workers interviewed who were not aware of the process. In one instance during an unannounced office visit, the reception staff did not know the location of the civil rights coordinator's information nor did the worker know who the Civil Rights Coordinator was. The annual Civil Rights Compliance Review should provide an opportunity to train all LAPDSS staff, not just workers that are preselected to answer interview questions. .

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

| Interview and review areas | Yes | No | Some-times | Findings |
|--|-----|----|------------|--|
| Can the employees easily identify the difference between a program, discrimination, and a personnel complaint? | | X | | <p>Preselected county staff interviewed over the phone were able to differentiate between the three types of complaints.</p> <p>Staff not preselected were not able to identify between the three types of complaints.</p> |
| Did the employees know who the Civil Rights Coordinator is? | | | X | <p>Preselected county staff interviewed over the phone were able identify the Civil Rights Coordinator.</p> <p>Staff not preselected were not able to identify who the Civil Rights Coordinator was.</p> |
| Did the employees know the location of the Civil Rights poster with information as to how and where the clients can file a discrimination complaint? | | | X | <p>Preselected county staff interviewed over the phone knew where the information was located.</p> <p>Staff not preselected were unable to provide information about the Civil Rights Coordinator.</p> |
| When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date? | X | | | |

| Interview and review areas | Yes | No | Some-times | Findings |
|--|-----|----|------------|----------|
| Is the County utilizing correct correspondence to address the final results to the complainant after the investigation is completed? | X | | | |

B. Corrective Action

| Element | Corrective Action |
|--------------------------|---|
| Discrimination Process | Los Angeles DPSS shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203 |
| Civil Rights Coordinator | Los Angeles DPSS shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21 |

IX. VENDOR CONTRACTS

Counties are required to ensure contracted services with contractors, vendors, consultants, and other providers of service, who receive state or federal assistance, include the assurance of compliance agreement.

Contracts Review

| | |
|---|----|
| Number of Contracts Reviewed | 12 |
| Number of Contracts w/Assurance of Compliance Agreement | 12 |

A. Corrective Action

None

X. CALL CENTER EVALUATION

County Call/Service Centers are evaluated to ensure services provided are nondiscriminatory toward non-English speaking clients and clients with a disability (physical, mental, or learning).

A. Findings from Call/Service Center site visit and interviews.

| Question | Yes | No | Comments |
|---|------------|-----------|---|
| Is the Call Center/Service Center publically accessible to clients for walk-in services? | | X | Call centers are to provide additional support to district offices. Participants must go into a district office to see their worker if they want face to face contact. |
| Does the Call Center/Service Center answer calls for the entire county, by district, or regional office? | | | LADPSS has 3 call centers. Each call center services a specific area with a local phone number, but a participant can call any of the 3 call centers. The call center also has a toll free number that will connect you to one of the call center locations. |
| Does the Call/Service Center have an Interactive Voice Response system? | X | | The voice prompt answers the phone in English followed by several other languages instructing the participant to select their preferred language. |
| If so, does the Interactive Voice Response system have language options for all county threshold languages? | X | | See comments above. |
| Does the Interactive Voice Response system have an option to request free interpretive services? | X | | When the participant selects their preferred language, they are connected to a worker who speaks that language. If a worker is unavailable in the participant's preferred language, the worker goes through the county's process for securing an interpreter. |
| Is the Call/Service Center accessible to clients with a disability (physical, mental, or learning)? | X | | Call centers have access to telecommunication devices to assist with the deaf/hard of hearing community. |

| | | | |
|---|----------|--|---|
| Does the Call/Service Center accommodate clients with a disability (physical, mental, or learning)? | X | | See comments above. |
| Are the Call/Service Center calls monitored for quality assurance? | X | | |
| Does the Call/Service Center staff provide services to client's individual case? | X | | Clients are encouraged to contact the call center for general information regarding their case. |

B. Corrective Action from Call Center

The Customer Service Center (CSC) answers questions, provides case information, and updates case records of participants. The CSC is a "single point of contact" providing services for all CalWORKs, CalFresh, Medi-Cal, and General Relief program participants. It has proven to be a fast and convenient way for participants to contact a county worker without having to go into the district offices.

The most common problem found in the CSC was the lack of case documentation when participants call for services. In several case comments made by CSC workers, there was no documentation in the case comments suggesting that interpretive services were provided to the participant. Per Division 21-116.2, referenced in All County Information Notice NO. I-02-08, counties are required to ask clients their preferred language for oral and written communication and document their preferred language(s) in the client's file. All County Letter (ACL) 06-20 states that "once the county has been informed that the applicant/recipient needs an interpreter, the county must offer and provide an interpreter at each client contact." The county must document in the client's case file that they offered free interpretive services, if the client accepted or refused interpretive services, who provided the interpretive services, and in what language the interaction was conducted.

XI. COMMUNITY INPUT

As a part of this review, and as noted in Section II , page 4, feedback was sought from community and advocate groups LAFLA, AAAJ-LA, and NLSLA. The following summarizes their observations, and will provide issues that the county management team can address to improve their operations from a civil rights perspective.

A. Major observations include:

1. CAB Advocates expressed their concern for the lack of interpretive services provided by LADPSS. Similar to previous years, another secret shopper survey was conducted. Advocate groups claim LADPSS frontline staff is unaware of language access policy as they defer to “administration” or “staff upstairs” if LEP participant required language services. Further, LADPSS staff stated that if an interpreter is unavailable in the local office, the participant may have to reschedule appointment or wait for a bilingual worker in another office to interpret. (could be discriminatory)
2. CAB Advocates shared that Civil Rights Section (CRS) is not open to having advocates present in Civil Rights trainings as advocate presence may alter dynamics of room. CRS also cites confidentiality as a reason for not having advocates in room. (could also be discriminatory)
3. CAB Advocates – AAAJ-LA shared that Cambodian-speaking participant was unable to get translated Welfare-to-Work contracts and forms, as well as interpretation for Welfare-to-Work classes. Participant was told that since no class available for LEP or Cambodian interpreter, she would have to wait to attend class until an interpreter is found. (Discriminatory)
4. CAB Advocates shared that many LEP participants do not understand that failure to provide language services is a discrimination on basis of national origin. The current form does not provide space to request for specific accommodation based on disability. CAB Advocates are requesting that the form be made more user-friendly.
5. CAB Advocates shared that AVAZA language line usage is low in LA County and unsure as to why it is so low. They question whether it's because DPSS staff unaware of AVAZA or front line staff not provided with access code for AVAZA.

XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Los Angeles Department of Public Social Services Civil Rights Compliance Plan for the 2015/2016 fiscal year was received May 20, 2015. It is approved as submitted.

XIII. CONCLUSION

The CDSS reviewer found Los Angeles Department of Public Social Services staff warm, welcoming, informative and very supportive. Special thanks to Mr. Charles Palmer, Ms. Sheila Early, and Mr. Ricardo Castaneda, for organizing the details of the review. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found Los Angeles Department of Public Social Services in partial

compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Los Angeles Department of Public Social Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.